

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION

ANDREW L. COLBORN,

Plaintiff,

v.

Case No. 19-CV-484

NETFLIX, INC.,
CHROME MEDIA, LLC, f/k/a
SYNTHESIS FILMS, LLC,
LAURA RICCIARDI, and
MOIRA DEMOS,

Defendants.

DECLARATION OF MICHAEL GRIESBACH

I, Michael Griesbach, under penalty of perjury and subject to 28 U.S.C.

§ 1746, declare as follows:

1. I am one of the plaintiff's attorneys in this case and am also the respondent in the document subpoena that is the subject of the motion to compel in the instant brief;
2. On March 11, 2022, my former attorney, John Mayer, conducted a meet and confer via telephonic conference with Netflix counsel Leita Walker regarding the subpoena Netflix served upon me.
3. I was in Attorney Mayer's office at his law firm in Manitowoc during the meet and confer and could hear the entire conversation as Attorney Mayer's speaker phone was on;

4. During the conference, Attorney Mayer informed Ms. Walker that among my objections to the subpoena was that the majority of the document requests called for production of documents that were privileged under Wisconsin's reporter privilege statute.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: June 8, 2022



Michael Griesbach